

CALLAHAN & BLAINE
A PROFESSIONAL LAW CORPORATION
3 HUTTON CENTRE DRIVE, NINTH FLOOR
SANTA ANA, CALIFORNIA 92707
TELEPHONE: (714) 241-4444
WWW.CALLAHAN-LAW.COM

CALLAHAN & BLAINE, APLC

David J. Darnell (SBN 210166)

ddarnell@callahan-law.com

Gaurav K. Reddy (SBN 259496)

greddy@callahan-law.com

3 Hutton Centre Drive, Ninth Floor

Santa Ana, California 92707

Telephone: (714) 241-4444

Facsimile: (714) 241-4445

Attorneys for Plaintiffs Ross Cornell and
Bryan Estrada

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Ross Cornell, an individual, and Bryan
Estrada, an individual;

Plaintiffs,

v.

Office of the District Attorney, County
of Riverside, and Does 1-100,
inclusive;

Defendants.

Case No. 5:22-cv-00789 JWH (SHKx)

[Assigned to Hon. John W. Holcomb]

**DECLARATION OF CHARLES
BALLARD IN SUPPORT OF
REPLY IN SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

*[Filed concurrently with Reply,
Declarations of Ross Cornell, Bryan
Estrada, and David J. Darnell,
Objections to Defendant's Evidence,
and Response to Defendant's
Evidentiary Objections]*

Date: July 8, 2022

Time: 9:00 a.m.

Courtroom: 9D

Action Filed: May 9, 2022

Trial Date: None set

DECLARATION OF CHARLES BALLARD

I, Charles Ballard, hereby declare as follows:

1. I am an individual over the age of 18 and I attest to the matters set forth herein of my own personal knowledge. I make this declaration in support of Plaintiffs' Reply in Support of Motion for Preliminary Injunction and specifically to rebut the evidence presented in Defendant's Opposition. If called upon to do so, I could and would competently testify in accordance with the matters set forth herein.

2. In August 2020, attorney Ross Cornell hired me to record videos of the exteriors of certain business locations in Riverside County.

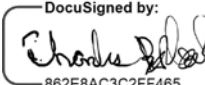
3. On August 20, 2020, I took a video of the exterior of the Corona Animal Hospital in Corona, California. A true and correct copy of a still image from this video recording depicting the exterior of Corona Animal Hospital is attached hereto as **Exhibit 1**.

4. On August 20, 2020, I took a video of the exterior of the Park Lanes Mobile Homes visitor office in Corona, California. A true and correct copy of a still image from this video recording depicting the exterior of the Park Lanes Mobile Homes visitor office, including the handicapped and visitor parking spots, is attached hereto as **Exhibit 2**.

5. On August 21, 2020, I took a video of the exterior of Ultra Imports Auto Parts. A true and correct copy of two still images from this video recording depicting the exterior of Ultra Imports Auto Parts, including the relevant parking area, is attached hereto as **Exhibit 3**.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 6/24/2022 in Riverside, California.

DocuSigned by:

862E8AC3C2EE465

Charles Ballard